

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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UNITED STATES

Case No. 03-CR-10356-MLW

SEP -1 P 3:51

UNITED STATES DISTRICT COURT
DISTRICT OF MASS.

v.

FREDERICK A. SIMONE, (1)
a/k/a FREDDY, a/k/a
THE NEIGHBOR;

VINCENT C. GIAOCCHINI, (2)
a/k/a DEE DEE; and

FRANCIS WHITE, (3)
a/k/a THE WHITE-HAIRED GUY

GOVERNMENT'S RESPONSE TO DEFENDANT FREDERICK A. SIMONE'S
MOTION FOR FURTHER EXTENSION OF TIME FOR PREPARATION AND FILING
OF SUBSTANTIVE MOTIONS


The United States of America, by and through its attorney, the United States Attorney for the District of Massachusetts, hereby respectfully assents to Defendant Frederick A. Simone's August 30, 2004 Motion for Further Extension of Time for Preparation and Filing of Substantive Motions. Government counsel has conferred with Richard M. Egbert, Esq., counsel for Defendant Francis White, and Robert A. George, Esq., counsel for Defendant Vincent C. Giaocchini. Mssrs. Egbert and George have stated that they intend to file motions to join in Simone's request that all defendants have until December 1, 2004 to file

substantive and discovery motions. The government assents to this joint request by all defendants.

Respectfully submitted,


MICHAEL J. SULLIVAN
United States Attorney

By:


ERNEST DiNISCO
COLIN OWYANG
Assistant U.S. Attorneys

CERTIFICATE OF SERVICE

I, Colin Owyang, do hereby certify that I served a copy of the foregoing pleading by first-class mail on September 1, 2004 on (1) counsel for defendant Frederick Simone, Kevin J. Reddington, Esq., 1342 Belmont Street, Suite 203, Brockton, MA 02301; (2) counsel for defendant Vincent Gioacchini, Robert A. George, Esq., 138 Newbury Street, Suite 3, Boston, MA 02116; and (3) counsel for defendant Francis White, Richard M. Egbert, Esq., 99 Summer Street, Boston, Massachusetts 02110.


COLIN OWYANG
Assistant U.S. Attorney